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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

VINH NGUYEN, INDIVIDUALLY
AND ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Plaintiff,

v.

RADIENT PHARMACEUTICALS
CORPORATION AND DOUGLAS C.
MACLELLAN,

Defendants.

CASE No.:CV-11-0406-DOC
(MLGx)

CLASS ACTION

**NOTICE OF MOTION AND
MOTION FOR ENTRY OF
ORDER PRELIMINARILY
APPROVING SETTLEMENT AND
ESTABLISHING NOTICE
PROCEDURES**

Hon. David O. Carter
Hearing Date: January 20, 2014
Time: 8:30 a.m.
Courtroom: 9D

1 PLEASE TAKE NOTICE that on January 20, 2014, at 8:30 a.m., Lead
2 Plaintiffs will move this Court, the Honorable David O. Carter, United States
3 District Judge of the United States District Court for the Central District of
4 California, 411 West Fourth Street, Santa Ana, California 92701 for entry of an
5 Order (a) preliminarily approving the settlement between Plaintiffs and
6 defendants Radient Pharmaceuticals Corporation and Douglas C. MacLellan (the
7 "Radient Defendants"); (b) approving the notice to the Class of the Proposed
8 Settlement, in substantially the same form as the Notice of Proposed Settlement
9 of Class Action; and (c) scheduling a final approval hearing for a date at the
10 Court's convenience. The Defendants do not oppose the relief requested by this
11 motion.

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13 Date: December 17, 2013

Respectfully submitted,

14 **THE ROSEN LAW FIRM, P.A.**

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/s/ Laurence Rosen

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Class Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

I, Laurence M. Rosen, hereby declare under penalty of perjury as follows:

I am the managing attorney of the Rosen Law Firm, P.A., with offices at 355 South Grand Avenue, Suite 2450, Los Angeles, CA 90071. I am over the age of eighteen.

On December 17, 2013, I electronically filed the following **NOTICE OF MOTION AND MOTION FOR ENTRY OF ORDER PRELIMINARILY APPROVING SETTLEMENT AND ESTABLISHING NOTICE PROCEDURES** with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

Executed on December 17, 2013.

/s/ Laurence Rosen
Laurence M. Rosen